

Michele H. Murphy 4530 Wisconsin Ave, NW, Suite 5 Washington, DC 20016 Tel. 202.450.5643 michele@oandzlaw.com

July 11, 2025

VIA ECF

The Honorable Jennifer L. Rochon United States District Court Southern District of New York 500 Pearl Street, Room 1920 New York, NY 10007

Re: Cengage Learning, Inc. v. Google LLC, No. 24-cv-04274-JLR-BCM Google's July 10, 2025 Letter Seeking a Stay

Dear Judge Rochon:

We write on behalf of Plaintiffs Cengage Learning, Inc., Bedford, Freeman & Worth Publishing Group, LLC d/b/a Macmillan Learning, Macmillan Holdings, LLC, Elsevier Inc., Elsevier B.V., and McGraw Hill LLC ("Plaintiffs"). On July 10, 2025 (Dkt. 117), Defendant Google LLC ("Google") filed a Letter Motion for Stay Pending Supreme Court's Decision in *Cox* (i.e., *Cox Communications, Inc. v. Sony Music Entertainment*, No. 24-171, 2025 WL 1787701 (U.S. June 30, 2025)). Plaintiffs intend to file a letter response opposing Google's unfounded request for a stay of this case.

Plaintiffs propose that they file their responsive letter by July 17, 2025. Google consents to this July 17, 2025 filing date.

The Local Rules of this Court and Your Honor's Individual Rules of Practice in Civil Cases do not appear to set a specific deadline for responding to the instant letter motion. To the extent Plaintiffs' request herein necessitates an extension of time, Plaintiffs have not previously requested an extension of time for responding to Google's July 10, 2025 letter, and Plaintiffs will be submitting their response within five business days after the filing of Google's letter.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Michele H. Murphy
Michele H. Murphy
OPPENHEIM + ZEBRAK, LLP